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Via ECF

Honorable Arun Subramanian
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Avraham Eisenberg
23 Cr. 10 (AS)

Dear Judge Subramanian:

Defendant Avraham Eisenberg respectfully submits his proposed verdict form, which is attached as Exhibit A. Earlier today the government submitted its proposed verdict form. (Dkt. 97.) The defense opposes the government's description of Count Two as "Swap Manipulation." It should read "Commodities Manipulation." Further, the verdict form should make it clear that the jury has made unanimous findings, which the government's proposed verdict form does not. The defense respectfully reserves the right to seek to amend the verdict form based on the jury instructions and the evidence at trial.

Respectfully submitted,

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-and-

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